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7 *Attorneys for Debtors and Reorganized Debtors*

8  
9 **UNITED STATES BANKRUPTCY COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

11 **In re:**

12 **PG&E CORPORATION,**

13 **- and -**

14 **PACIFIC GAS AND ELECTRIC**  
**COMPANY,**

15 **Debtors.**

16

17  Affects PG&E Corporation  
18  Affects Pacific Gas and Electric Company  
19  Affects both Debtors

20 \* *All papers shall be filed in the Lead Case, No.*  
*19-30088 (DM).*

21 Bankruptcy Case No. 19-30088 (DM)

22 Chapter 11

23 (Lead Case) (Jointly Administered)

24 **NOTICE OF HEARING ON REORGANIZED**  
**DEBTORS' FORTY-FIFTH OMNIBUS**  
**OBJECTION TO CLAIMS (REDUCED AND**  
**ALLOWED CLAIMS)**

25 **Response Deadline:**  
**December 1, 2020, 4:00 p.m. (PT)**

26 **Hearing Information If Timely Response Made:**

27 Date: December 15, 2020  
28 Time: 10:00 a.m. (Pacific Time)  
Place: (Telephonic Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1           **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E Corporation  
2 and Pacific Gas and Electric Company, as debtors and reorganized debtors (the “**Debtors**,” or as  
3 reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases  
4 (the “**Chapter 11 Cases**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the  
United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the  
Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”).

5           **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on  
6 **December 15, 2020, at 10:00 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) before the Honorable  
Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Fourth  
Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency, all hearings  
through March 1, 2021 will be held by video or teleconference. The courtroom will be closed.*  
All parties who wish to appear at the Omnibus Hearing must make arrangements to appear  
telephonically with CourtCall at 1-866-582-6878 no later than 4:00 p.m. (Pacific Time) on the day  
before the Omnibus Hearing. Further information regarding telephonic appearances via CourtCall can  
be found on the Bankruptcy Court’s website, at the following location: [www.canb.uscourts.gov](http://www.canb.uscourts.gov) >  
Rules and Procedures > District Procedures > Policy and Procedure for Appearances by Telephone.  
Charges have been waived by CourtCall for pro se parties.

11           **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters to be heard at the  
12 Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Reorganized Debtors’ Forty-Fifth  
Omnibus Objection to Claims (Reduced and Allowed Claims)*, filed on November 5, 2020  
13 [Dkt. No. 9466] (the “**Omnibus Objection**”).

14           **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Omnibus  
Objection must be in writing, filed with the Bankruptcy Court, and served on counsel for the  
15 Reorganized Debtors at the above-referenced address or by email at [PGEclaims@kbkllp.com](mailto:PGEclaims@kbkllp.com) so as to  
be received by no later than **4:00 p.m. (Pacific Time) on December 1, 2020**. Any oppositions or  
16 responses must be filed and served as described in the *Order Approving (A) Procedures for Filing  
Omnibus Objections to Claims and (B) the Form and Manner of the Notice of Omnibus Objections*,  
17 entered on July 1, 2020 [Dkt No. 8228] (the “**Omnibus Objections Procedures Order**”). **Any relief  
requested in the Omnibus Objection may be granted without a hearing if no opposition is timely  
filed and served in accordance with the Omnibus Objections Procedures Order.** In deciding the  
18 Omnibus Objection, the Court may consider any other document filed in these Chapter 11 Cases and  
19 related Adversary Proceedings.

20           **PLEASE TAKE FURTHER NOTICE** that a customized Forty-Fifth Omnibus Claim  
Objection Notice in substantially the form attached hereto as **Exhibit A** has been sent to each of the  
21 parties to whose Proof(s) of Claim the Reorganized Debtors objected in the Omnibus Objection.

22           **PLEASE TAKE FURTHER NOTICE** that copies of the Omnibus Objection and its  
23 supporting papers can be viewed and/or obtained: (i) by accessing the Court’s website at  
<http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden  
24 Gate Avenue, San Francisco, CA 94102, or (iii) from the Reorganized Debtors’ notice and claims  
agent, Prime Clerk LLC , at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll  
25 free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:  
26 [pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com). Note that a PACER password is needed to access documents on the  
27 Bankruptcy Court’s website.

1 Dated: November 5, 2020

2 **KELLER BENVENUTTI KIM LLP**

3 /s/ Peter J. Benvenutti  
4 Peter J. Benvenutti

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Attorneys for Debtors and Reorganized Debtors

## **Exhibit A**

## **Forty-Fifth Omnibus Claim Objection Notice**

1 KELLER BENVENUTTI KIM LLP  
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THE OBJECTION DESCRIBED IN  
THIS NOTICE ASKS THE COURT TO  
REDUCE YOUR CLAIM(S)  
IDENTIFIED AS "OBJECTION-TO" ON  
THE FOLLOWING PAGE OF THIS  
NOTICE.

CLAIMANTS RECEIVING THIS  
NOTICE SHOULD READ THIS  
NOTICE CAREFULLY BECAUSE THE  
OBJECTION MAY AFFECT YOUR  
RIGHT TO RECEIVE A  
DISTRIBUTION ON YOUR CLAIM IN  
THIS CASE.

IF YOU HAVE QUESTIONS, PLEASE  
CONTACT PRIME CLERK, LLC, AT  
(844) 339-4217

THE LAST PARAGRAPH OF THIS  
NOTICE EXPLAINS HOW YOU CAN  
OBTAIN A COMPLETE COPY OF THE  
OBJECTION, AT NO COST TO YOU.

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

Affects PG&E Corporation  
 Affects Pacific Gas and Electric Company  
 Affects both Debtors

\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF THE REORGANIZED  
DEBTORS' FORTY-FIFTH OMNIBUS  
OBJECTION TO CLAIMS (REDUCED AND  
ALLOWED CLAIMS)**

**Response Deadline:**  
**December 1, 2020, 4:00 p.m. (PT)**

**Hearing Information If Timely Response Made:**

Date: December 15, 2020

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 [Claimant Name]

2

Objected-To Claim(s)					Reduced Amount
Date	Claim #	Debtor	Classification	Amount	

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6 On November 5, 2020, PG&E Corporation and Pacific Gas and Electric Company, as debtors  
7 and reorganized debtors (collectively, the “**Debtors**,” or as reorganized pursuant to the Plan, the  
8 “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed  
9 their *Forty-Fifth Omnibus Objection to Claims (Reduced and Allowed Claims)* (the “**Omnibus  
Objection**”) with the United States Bankruptcy Court for the Northern District of California (San  
Francisco Division) (the “**Bankruptcy Court**”). A full copy of the Omnibus Objection may be  
obtained at no cost, as provided below.

10 **Any Response (as defined below) to the Omnibus Objection must be filed and  
11 served upon the Reorganized Debtors’ Counsel by December 1, 2020 (the  
“Response Deadline”);**

12 **Any Response must be accompanied by any declarations or memoranda of law any  
13 responding party wishes to present in support of its position;**

14 **If there is no timely Response, the Bankruptcy Court may enter an order granting  
the Omnibus Objection to your Proof(s) of Claim by default.**

15 **If you file a timely Response, the Hearing will be held at the date and time shown  
16 below. If factual disputes are presented by the Objection and the Response, the  
17 Hearing will proceed as a status conference; factual disputes will not be decided at  
the Hearing, but at a future evidentiary hearing that may be set at the Hearing.  
18 Issues of a purely legal nature, where facts are not in dispute, may be decided at  
the Hearing. See Bankruptcy Local Rule 3007-1.**

19 **If you file and serve a timely Response, the date, location and time of the Hearing  
20 are:**

21 **December 15, 2020 at 10:00 a.m. (Pacific Time)**

22 **Courtroom 17, 16<sup>th</sup> Floor, 450 Golden Gate Ave., San Francisco, CA**

23 The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy  
24 Judge. Pursuant to the Bankruptcy Court’s *Fourth Amended General Order No. 38 In re: Coronavirus  
25 Disease Public Health Emergency, all hearings through March 1, 2021 will be held by video or  
teleconference. The courtroom will be closed.* All parties who wish to appear at the Omnibus  
26 Hearing must make arrangements to appear telephonically with CourtCall at 1-866-582-6878 no later  
than 4:00 p.m. (Pacific Time) on the day before the Omnibus Hearing. Further information regarding  
27 telephonic appearances via CourtCall can be found on the Bankruptcy Court’s website, at the  
following location: [www.canb.uscourts.gov](http://www.canb.uscourts.gov) > Rules and Procedures > District Procedures > Policy and  
Procedure for Appearances by Telephone. Charges have been waived by CourtCall for pro se parties.

1 Reorganized Debtors' Counsel will, as a courtesy and on request, provide by email to those who have  
2 filed timely Responses updated information regarding how to attend.

2 **These Omnibus Claims Objection Procedures DO NOT APPLY to any proofs of claim  
3 with respect to (a) FIRE VICTIM CLAIMS or (b) SUBROGATION WILDFIRE CLAIMS.**

4 **BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM:** By the Omnibus  
5 Objection, the Reorganized Debtors seek to allow one or more of your Proof(s) of Claim (as defined  
therein) listed above as "Objected-To Claim(s)" at the Reduced Amount listed above.

6 If you do **NOT** oppose the allowance of your Objected-To Proof(s) of Claim at the Reduced  
7 Amount listed above, then you do **NOT** need to file a written Response to this Omnibus Objection and  
8 you do **NOT** need to appear at the Hearing. If you do nothing, the Objected-To Claim(s) will be  
allowed at the Reduced Amount, and the Reorganized Debtors waive any further objection to such  
Claim.

9 **FILING AND SERVICE OF RESPONSE:** If you **DO** oppose the reduction of your  
10 Objected-To Proof(s) of Claim listed above, then you **MUST** file a response (a "**Response**"), in  
writing, with the Bankruptcy Court, and serve it on the counsel for the Reorganized Debtors at  
11 PGEclaims@kbkllp.com so as to be received by no later than **4:00 p.m. (Pacific Time) on December  
1, 2020 (the "Response Deadline")**: You must file the Response through the Court's electronic case  
12 filing ("ECF") system if you have access to the ECF system; service on the Reorganized Debtors'  
Counsel will occur automatically upon ECF filing; and no separate service of your Response is  
13 required. If you do **NOT** have access to the ECF system, service must be made by electronic mail to  
the Reorganized Debtors' counsel at PGEclaims@kbkllp.com, and you must arrange for the Response  
14 to be filed with the Court within two business days thereafter. If you do not have the ability to serve a  
Response electronically, the Response must be served by mail, express or some other means so either  
15 (a) it is actually received by the Reorganized Debtors' Counsel by the Response Deadline, or (b) it is  
16 dispatched not later than the Response Deadline through a postal or commercial express service that  
will make actual delivery not more than two business days after the Response Deadline, and in that  
17 case the Claimant must inform the Reorganized Debtors' counsel by email, telephone or facsimile  
before the Response Deadline of the Claimant's name and phone number, the number of the Omnibus  
18 Objection, and the fact that a paper Response is being delivered by express.

19 **CONTENTS OF RESPONSE** The Response must, at a minimum, include the following:  
20 (i) a caption setting forth the name of the Bankruptcy Court, the name of the Reorganized Debtor, the  
case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the  
21 assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of  
Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain  
the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal  
22 knowledge of the relevant facts that support the Response; (vi) your name, address, telephone number,  
and/or the name, address, and telephone number of your attorney and/or designated representative to  
23 whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vii) the  
name, address, telephone number, and email address of the party with authority to reconcile, settle, or  
otherwise resolve the Omnibus Objection on your behalf, if any.

25 If the Bankruptcy Court does not reduce the amount of your Objected-To Proof(s) of Claim  
26 listed above, then the Reorganized Debtors have the right to object on other grounds to your Proof(s)  
27 of Claim at a later date. You will receive a separate notice of any such objection.

**TO GET COPIES OF THE COMPLETE OBJECTION:** Copies of the complete Omnibus Objection and the other pleadings and documents identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court's website at <http://www.canb.uscourts.gov> [PACER account required], (ii) for free by download from on the Reorganized Debtors' approved notice and claim agent's website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free, by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at [pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com) to request a complete copy of the Omnibus Objection, including all Exhibits.

Dated: November 5, 2020

## KELLER BENVENUTTI KIM LLP

/s/ Peter J. Benvenutti  
Peter J. Benvenutti

*Attorneys for Debtors and Reorganized Debtors*